

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

TQ DELTA, LLC.,

Plaintiff,

v.

TIME WARNER CABLE INC., et al.,

Defendants.

C.A. No. 15-615-RGA

**TQ DELTA’S MOTION TO COMPEL TIME WARNER CABLE
TO PROVIDE DISCOVERY REGARDING ITS “GATEWAY” DEVICES**

Pursuant to Fed. R. Civ. P. 371(a)(1), Plaintiff TQ Delta, LLC (“TQ Delta”) hereby moves the Court for an Order compelling Defendants Time Warner Cable Inc. and Time Warner Cable Enterprises LLC (collectively, “TWC”) to provide discovery regarding “Gateway” devices that were actively deployed and/or in use in TWC’s networks at any time between May 2014 and November 2020.

Pursuant to the Court’s Order Appointing Special Master (D.I. 297) and Special Master Order #1 (D.I. 303), only this Motion and a [Proposed] Order are being filed with the Court.

Pursuant to Special Master Order #1 (D.I. 303), TQ Delta’s three-page letter brief and attachments are being sent directly to the Special Master and served on counsel for all parties.

Dated: August 26, 2021

Respectfully submitted,

FARNAN LLP

/s/ Michael J. Farnan

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